

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FREDERICK J. GREDE, not individually but as	)	
Liquidation Trustee of the Sentinel Liquidation	)	
Trust,	)	
	)	Honorable Rebecca R. Pallmeyer
Plaintiff,	)	
v.	)	
	)	Case No. 09-cv-00101
PENSON FINANCIAL FUTURES, INC. and	)	
PENSON FUTURES f/k/a PENSON GHCO,	)	
	)	
Defendant.	)	

**PENSON FINANCIAL FUTURES, INC. AND PENSON FUTURES’  
MOTION FOR ENTRY OF JUDGMENT ON COUNTS I THROUGH VII OF THE  
TRUSTEE’S SECOND AMENDED COMPLAINT**

Defendants, Penson Financial Futures, Inc. (“PFFI”) and Penson Futures f/k/a Penson GHCO (“Penson Futures,” and collectively with PFFI, “Penson”), respectfully submit this Motion for Entry of Judgment on Counts I through VII of the Trustee’s Second Amended Complaint. Specifically, PFFI and Penson Futures seek an Order from the Court: (1) entering judgment in PFFI’s favor and against the Trustee on Counts I, II, V, VI and VII of the Trustee’s Second Amended Complaint; (2) directing the Trustee to pay PFFI its pro rata share of the SEG 1 Reserve and the 7.20 Disputed Claims Reserve within seven days of this Court’s entry of judgment on Count V; (3) entering judgment in Penson Futures’ favor and against the Trustee on Counts III through VII of the Trustee’s Second Amended Complaint; (4) directing the Trustee to pay Penson Futures its pro rata share of the SEG 1 Reserve, the Section 7.20(b) Disputed Claims Reserve, the SEG 3/4 Reserve, and the SEG 2 Reserve within seven days of this Court’s entry of judgment on Count V, and (5) granting all other just relief.

A Memorandum of Law has been submitted herewith.

Accordingly, in view of the arguments in the accompanying memorandum, (i) PFFI respectfully requests that the Court GRANT the Motion for Entry of Judgment on Counts I, II, V, VI and VII of the Trustee's Second Amended Complaint; and (ii) Penson Futures respectfully requests that the Court GRANT the Motion for Entry of Judgment on Counts III through VII of the Trustee's Second Amended Complaint.

Dated: October 16, 2017

Respectfully submitted,

PENSON FINANCIAL FUTURES, INC. and  
PENSON FUTURES f/k/a PENSON GHCO

By: /s/Timothy R. Casey  
One of their attorneys

Timothy R. Casey, Esq. (ARDC #6180828)  
DRINKER BIDDLE & REATH LLP  
191 North Wacker Drive, Suite 3700  
Chicago, Illinois 60606  
Telephone: (312) 569-1000  
Fax: (312) 569-3000  
[timothy.casey@dbb.com](mailto:timothy.casey@dbb.com)

**CERTIFICATE OF SERVICE**

I, Timothy R. Casey, an attorney, hereby certify that on October 16, 2017, I electronically filed the foregoing PENSON FINANCIAL FUTURES, INC. and PENSON FUTURES' MOTION FOR ENTRY OF JUDGMENT ON COUNTS I THROUGH VII OF THE TRUSTEE'S SECOND AMENDED COMPLAINT with the Clerk of the Court using the CM/ECF system, which caused the same to be served on all counsel of record via the Court's ECF system.

By: /s/Timothy R. Casey